



# California Fair Political Practices Commission

September 2, 1987

Mr. Jim Gass  
California Association of Independent  
Business, Inc.  
P.O. Box 1294  
Rancho Cucamonga, CA 91730

Re: Your Request for Advice  
Our File No. A 87-206

Dear Mr. Gass:

You have requested advice concerning the campaign disclosure provisions of the Political Reform Act (the "Act").<sup>1/</sup>

## QUESTION

Are there any restrictions that apply to either a lobbyist or a lobbyist employer with regard to sponsoring an initiative measure for the ballot?

## CONCLUSION

The Political Reform Act does not prohibit persons from engaging in campaign activities. The Act does, however, require that certain activities be disclosed on campaign statements. There are no special requirements or restrictions that apply to a lobbyist or lobbyist employer with regard to sponsoring a ballot measure.

## ANALYSIS

Section 82013 defines the term committee to mean "any person or combination of persons" who directly or indirectly does any of the following:

- (a) Receives contributions totaling five hundred dollars (\$500) or more in a calendar year;

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<sup>1/</sup>Government Code Sections 81000-91015. All statutory references are to the Government Code unless otherwise indicated. Commission regulations appear at 2 California Administrative Code Section 18000, et seq. All references to regulations are to Title 2, Division 6 of the California Administrative Code.

(b) Makes independent expenditures totaling five hundred dollars (\$500) or more in a calendar year; or

(c) Makes contributions totaling ten thousand dollars (\$10,000) or more in a calendar year to or at the behest of candidates or committees.

When a person qualifies as a committee, certain filing requirements are triggered depending on the type of committee and the level of activity the committee engages in.

Committees primarily formed to support or oppose the qualification of a ballot measure, and proponents of state ballot measures who control a ballot measure committee, are required to file disclosure statements reporting contributions received and expenditures made in connection with the qualification effort. If the measure qualifies for the ballot, the first disclosure statement is due no later than 35 days after the date of notification that the measure has qualified, or 15 days prior to the deadline for submission of the ballot argument in favor of the measure, whichever date is earlier. If the measure fails to qualify, the first disclosure statement must be filed no later than 35 days after the deadline for filing petitions, or 35 days after the date of notification that the measure has failed to qualify, whichever date is earlier. (Section 84200.5)

Please refer to page 16 of the enclosed 1987 "Information Manual on Campaign Disclosure Provisions of the Political Reform Act" for additional information concerning qualification committees and committees primarily formed to support or oppose state or local ballot measures once the measure has been qualified to be placed on the ballot.

Please do not hesitate to contact me at (916) 322-5662 if I may be of further assistance.

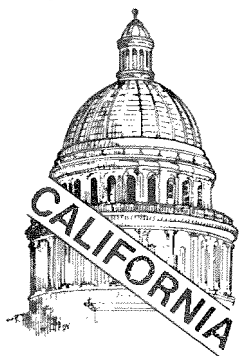
Sincerely,

Diane M. Griffiths  
General Counsel



By: Mary Ann Kvasager  
Political Reform Consultant

DMG:MAK:kmt  
Enclosure



**CAIB**

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*California Association of Independent Business, Inc.*

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Diane Griffiths  
FPPC  
Sacramento, Ca 95814

7-27-87

Dear Diane;

Please inform me of any and all restrictions that apply to either a lobbyist or lobbyist employer with regard to sponsoring an initiative measure for the ballot. If there are no restrictions, please let me know that only normal requirements apply.

Thank you,

Jim Gass

  
President



# California Fair Political Practices Commission

August 3, 1987

Jim Gass, President  
CAIB  
P.O. Box 1294  
Rancho Cucamonga, CA 91730

Re: 87-206

Dear Mr. Gass:

Your letter requesting advice under the Political Reform Act was received on July 31, 1987 by the Fair Political Practices Commission. If you have any questions about your advice request, you may contact me directly at (916) 322-5662.

We try to answer all advice requests promptly. Therefore, unless your request poses particularly complex legal questions, or more information is needed, you should expect a response within 21 working days if your request seeks formal written advice. If more information is needed, the person assigned to prepare a response to your request will contact you shortly to advise you as to the information needed. If your request is for informal assistance, we will answer it as quickly as we can. (See Commission Regulation 18329 (2 Cal. Adm. Code Sec. 18329).)

You also should be aware that your letter and our response are public records which may be disclosed to the public upon receipt of a proper request for disclosure.

Very truly yours,

A handwritten signature in cursive script, appearing to read "Jeanne Pritchard", is written over the typed name.

Jeanne Pritchard  
Chief  
Technical Assistance and Analysis  
Division

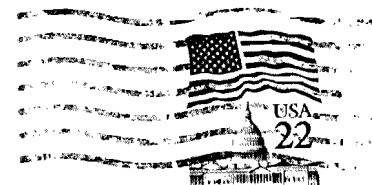
JP:jaj



**CAIB**

CALIFORNIA ASSOCIATION OF  
INDEPENDENT BUSINESS, INC.

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Fair Political Practices Commission  
428 "J" Street Ste. 800  
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Attn: Diane Griffiths - General Counsel

